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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of the)	GEN Docket No. 90-314
Commission's Rules To)	ET Docket No. 92-100
Establish New Personal)	
Communications Services)	

To: The Commission

REPLY COMMENTS
OF THE
INDUSTRIAL TELECOMMUNICATIONS ASSOCIATION, INC.

The Industrial Telecommunications Association, Inc. ("ITA"), hereby respectfully submits these Reply Comments responsive to comments filed with the Commission regarding the "Report and Recommendations of the Unlicensed PCS Ad Hoc Committee For 2 GHz Microwave Transition and Management" ("UTAM").

1. In comments filed on June 21, 1993, ITA endorsed UTAM's proposed approach for implementation of unlicensed PCS devices. ITA concurred in UTAM's recommendation that an "Unlicensed PCS Entity" be recognized under Section 332 of the Communications Act of 1934, as amended, to perform essential spectrum management and microwave system relocation functions.

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2. ITA recognizes the validity of concerns expressed by representatives of private operational-fixed microwave licensees regarding the potential for interference between unlicensed PCS devices and existing microwave operations. As discussed in various comments, interference might occur in one of two ways: (1) interference from unlicensed non-nomadic PCS devices to microwave systems operating in the 1910-1930 MHz band prior to complete band clearing; and (2) interference from unlicensed PCS devices to microwave systems operating on frequencies immediately adjacent to the 1910-1930 MHz band.

3. As the Commission will readily recognize, there is no practical way to ensure that interference will never occur. There are, however, ways to minimize and control the harmful effects of the interference. There must, first, be an entity established with primary responsibility for investigating and resolving interference situations. Second, that entity must have an up-to-date and accurate data base at its disposal to assist in identifying all possible sources of an offending radio transmission. Third, the entity must be diligent in pursuing the possible causes of the interference. Fourth, the entity must be able to assess responsibility in individual interference cases. Finally, the entity must have the backing of the Commission to ensure that its

findings are authoritative and enforceable.¹

[REDACTED]

WHEREFORE, THE PREMISES CONSIDERED, the Industrial Telecommunications Association, Inc. respectfully submits these Reply Comments and urges the Federal Communications Commission to act in accordance with the views expressed herein.

**INDUSTRIAL TELECOMMUNICATIONS
ASSOCIATION, INC.**

By: 

Mark E. Crosby, President
and Managing Director

By: 

Frederick J. Day, Esq.
Director, Government Relations

Dated: July 20, 1993